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RCRA Compliance Evaluation Inspection

Square D Company 3700 6th Street S. W. Cedar Rapids, Iowa 52404

IAD000819110



RCRA COMPLIANCE EVALUATION INSPECTION

PREPARED FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII TOXIC AND WASTE MANAGEMENT DIVISION COMPLIANCE AND RESPONSE BRANCH

RCRA Compliance Evaluation Inspection

FACILITY DESCRIPTION

Facility:

Square D Company 3700 6th Street S.W.

Cedar Rapids, Iowa 52404

EPA Identification Number:

IAD 000819110

Date of Inspection:

October 29, 1987

Inspectors:

Charles L. Willhite and Steve Freeman

Tetra Tech, Inc.

Facility Representative:

Barbara Sines, Plant Manager

Todd Spratte, Loss Control Supervisor Mike Murray, Unit Manager of Fabrication

Jim Jensen, U.S. EPA Coordinator

November 30, 1987

TC 3620-59

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1.0 INTRODUCTION

On October 29, 1987, a RCRA Compliance Evaluation Inspection (CEI) was performed by Tetra Tech, Inc. personnel at the Square D Company (SDC), under the Technical Enforcement Support IV (TES IV) Contract, Work Assignment Number 286, for the Region VII U.S. Environmental Protection Agency.

This report consists of a discussion of the facility's RCRA background, a summary of the facility's reported management practices, observations made during the investigation, document review findings, and a listing of violations. The investigation report is supplemented with photographs to support some of the observations. Documentation requested from SDC during the visit, and copies of the following RCRA compliance checklists are provided as report attachments (Attachment B):

- o RCRA Compliance Inspection Report Generation Checklist
- o RCRA F-Solvent Land Disposal Restrictions Checklist.

2.0 PARTICIPANTS

An inspection of SDC's hazardous waste management units was conducted on October 29, 1987 by Charles L. Willhite and Steve Freeman of Tetra Tech, Inc., representing U.S. EPA Region VII. Tetra Tech personnel were met by Operators of SDC, including Barbara Sines, Plant Manager; Jim Jensen, U.S. EPA Coordinator; Mike Murray, Unit Manager of Fabrication; and Todd Spratte, Loss Control Supervisor.

3.0 INSPECTION PROCEDURES

Tetra Tech, Inc. personnel presented SDC officials with a U.S. EPA Letter of Authorization (Attachment A) and explained the purpose of the CEI. The Confidential Business Information (CBI) (Attachment B) forms were explained, but no CBI was requested by Ms. Sines. An in-briefing was conducted for SDC officials upon arrival at the facility.

Mr. Jensen gave a brief overview of SDC's manufacturing processes and explained the waste streams generated at the facility. The inspection consisted of two parts: a review of relevant documents, and a visual inspection of the SDC facility. At the end of the inspection, Tetra Tech personnel reviewed their findings and observations with Ms. Sines, Mr. Jensen, Mr. Murray, and Mr. Spratte.

4.0 FACILITY DESCRIPTION

Background information on the hazardous waste management practices at the subject facility was provided by documentation in U.S. EPA Region VII files and through discussion of the facility's history with the operator. A summary of this information is provided below.

SDC manufactures molded case circuit breakers for use in heavy industrial and power circuit applications. SDC employs 800 persons, operating three shifts, five days per week.

4.1 RCRA Status

An EPA Notification of Hazardous Waste Activity form was submitted by SDC on July 31, 1980, identifying the facility as a generator of F001, F002, F003, F006, and F009 wastes. A RCRA Part A application was submitted by SDC on November 12, 1980. The U.S. EPA reviewed the application, and decided the facility was one which was not required to submit a Part A under Section 3005 of RCRA, and suspended the facility from regulation under Parts 264 and 265. The Part A was submitted as a result of SDC's wastewater treatment activities, which included the treatment of wastewater from plating processes in tanks. When the U.S. EPA later amended the hazardous waste rules to no longer require the owners and operators of wastewater treatment facilities to obtain a permit under RCRA, SDC requested that their Part A Permit Application be withdrawn through correspondence submitted on April 24, 1981. A subsequent notification was submitted on June 2, 1983, deleting F002 and F009 wastes. This was a result of inconsistencies noted by the Iowa Department of Environmental Quality when the comparing information on the original hazardous waste forms with the February 25, 1983 annual report. An updated, amended Notification was submitted on June 14, 1985, adding a silver acid stripping solution waste, D002, and changing the installation contact to Mr. James Jensen. An additional Notification was submitted on August 29, 1985, adding a parts washer solvent from Safety Kleen as an ignitable waste (D001). The last Notification was submitted on September 3, 1986, listing the same five waste categories and updating the facility contact.

5.0 OBSERVATIONS

5.1 Waste Streams

An examination of the company's records indicates that SDC generates at least seven separate waste streams. These include:

- o Cutting and machine oils (110 gallons/month)
- o Paper and packing wastes (160 cubic yards/month)
- o Overspray paint filters (14 filters/month)
- o F006 wastewater treatment sludge (4,400 kg/month)
- o F003 xylene from the cleaning of paint equipment (265 kg/month)

- o F001 1,1,1-trichloroethane from vapor degreasing (1,700 kg/month)
- o D001 mineral spirits from Safety Kleen parts washing cabinets.

Of these waste streams, the last four are considered RCRA Subtitle C hazardous wastes.

F006 wastewater treatment sludge is generated from the plating area and wastewater treatment unit. The plating waste is discharged through the wastewater treatment unit and into the sanitary sewer. The F006 sludge is transported and disposed of at the Peoria Disposal Company, U.S. EPA ID# ILD00805812.

Spent xylene is generated from the cleaning of paint guns and lines. The waste xylene is transported by Hydrite Chemical Company, U.S. EPA ID# IAT200010593, to their facility in Waterloo, Iowa for recycling.

Spent mineral spirits are generated from parts washing cabinets leased from Safety Kleen, and the cleaning of two computer aided design printing machines. According to the MSDS, the waste mineral spirits are considered an ignitable (D001) characteristic waste (Attachment D). The waste D001 is picked up on a frequency ranging from two weeks to one month by Safety Kleen Corporation of Davenport, Iowa, U.S. EPA ID# IAD098027592, for recycling.

The waste 1,1,1-trichloroethane (F001) is also recycled by Hydrite Chemical Company.

At the time of the inspection, two 55-gallon drums of 1,1,1-trichloroethane, and one 55-gallon drum of waste xylene were noted in storage.

5.2 Records

The following Material Safety Data Sheets were obtained during the inspection to support the findings and conclusions made in the report:

- o Safety Kleen furnished an MSDS for the mineral spirits used in cleaning parts
- o Hydrite Chemical Company provided SDC with an MSDS on the 1,1,1-trichloroethane.

5.3 <u>Land Disposal Restrictions Compliances</u>

An estimated quantity of 1,700 kg of F001 and 265 kg of F003 solvent waste, subject to 40 CFR 268, are generated per calender month. Paint guns are cleaned in equipment cleaning tanks of xylene. 1,1,1-trichlor-oethane is generated from the vapor degreaser. No testing of the waste using the Toxicity Characteristic/Leachate Procedure (TCLP) Test has occurred. SDC did not provide the treatment facility with the

appropriate treatment technology for past shipments. However, a Restricted Waste Notification was presented to the inspectors, which was supplied by the treatment facility and was to accompany all future shipments of F001 and F003 wastes (Attachment H).

6.0 SITE INVESTIGATION

A site investigation was performed at SDC. The site investigation was supplemented with photographs to support some of the observations made (Attachment E).

Fabrication processes at SDC include: machining, brazing, punch pressing; and nickle, zinc, and silver plating. Waste hydraulic oil from the punch presses is sent to Marco of Dalton, Illinois. Prior to plating, parts are first cleaned in a caustic cleaner called Soak Clean to remove oil and grease. The part is then rinsed and cleaned in a solution of Electro Clean. A rinse stage follows and the part is then cleaned in a 50% solution of hydrochloric acid followed by a final two-stage water rinse. All wastewater from the parts cleaning operation flows through a wastewater pretreatment unit prior to discharge to the City of Cedar Rapids POTW.

A nickel and zinc plating process is operated at SDC. The stages are as follows:

Zinc Plating Line

- 1. Zinc chloride bath (400 gallon capacity)
- 2. Three stage rinse
- 3. Chromate bath
- 4. Rinse.

Sulfamate Nickle Plating Line

- 1. Nickel bath (400 gallons capacity)
- 2. Three stage rinse
- 3. Nickel reclamation station
- Three stage rinse.

All chromate flows into a dump station for pH adjustment and reduction of chrome with sodium bisulfite. All wastewater, including rinses, flows into a wastewater pretreatment unit (Exposure #1). A copy of the wastewater flow diagram was furnished by Mr. Jensen (Attachment F). Cyanide destruction occurs with calcium hypochlorite. A nickel recovery unit is utilized in which nickel rinse is evaporated, with the condensate being returned to the rinse and the concentrated nickel solution is returned to the plating bath by means of a closed loop system. Polymers to assist in floc formation and settling are added in a Lamella clarifier. The Lamella clarifier consists of a vertical, 3,000 gallon capacity conical tank. The sludge is then dewatered in a filter press, with the wastewater being discharged to the City of Cedar Rapids POTW. The sludge is collected and stored in polypropylene bags of approximately 1,500 pounds capacity (Exposure #2). One bag of F006 sludge was in storage at the time of the inspection. The

pretreatment unit meets the definition of a wastewater treatment unit as described in 40 CFR 260.10. A copy of the test results on the metal hydroxide sludge was obtained at the time of the inspection (Attachment G).

SDC also plates parts in a cyanide silver bath. The steps include:

- 1. Clean with caustic cleaner
- 2. Two rinses
- 3. Sulfuric acid (50%) bath
- 4. Two rinses
- 5. Silver strike bath (strike means the application of a thin layer of silver)
- 6. A second, more concentrated silver bath
- 7. Two-stage rinse.

All waste water, including rinse water, flows through the wastewater pretreatment unit and is discharged to the sanitary sewer. Sulfuric acid was previously used to strip silver from improperly plated parts. The silver plating solution was listed as a corrosive (D002) waste. The process was discontinued with the last off-site shipment occurring in January 1986. Parts that needed shipping were later shipped off-site to another firm, Handy and Harmon of Fairfield, Connecticut. An alternate silver stripping process is currently being utilized at SDC. This method involves the stripping of silver in a neutral solution, using reverse current in a 150-gallon tank. The solution is decanted with the silver precipitate dried in an oven. The system had been in operation for less than one year, and no waste or sludge has been generated from the process.

Parts to be degreased are dipped in a vapor degreaser with 1,1,1-trichloroethane (Exposure #3). Spent 1,1,1-trichloroethane is pumped from the degreaser into 55-gallon drums.

Spray painting is done in two spray painting booths at SDC. Eight filters with dimensions of $12" \times 18" \times 1"$ are used in one booth, while six filters with dimensions of $18" \times 24" \times 1"$ are used in the second booth (Exposure 4). The filters are changed approximately once per month. The spent overspray paint filters are discarded with the trash and refuse which is sent to the Cedar Rapids Sanitary Landfill. Results of waste analyses for the EP Toxic parameters and ignitability tests indicate that the filters are not hazardous (Attachment G).

The preparedness and prevention procedures, contingency plan, and personnel training plan were reviewed during the inspection. All personnel training was properly documented with a developed list of job titles for those personnel involved in hazardous waste management and handling. The contingency plan includes all the required emergency response activities, emergency response equipment (including location of the equipment), and an evacuation plan.

7.0 OTHER ISSUES INVESTIGATED

No other significant issues were noted.

8.0 FINDINGS AND CONCLUSIONS

All portions of the CEI checklist which are applicable to SDC were completed during the inspection. No violations were noted during the inspection and the facility appears to be in full compliance with RCRA requirements.

ATTACHMENT A Letters of Authorization



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

OCT 23 1987

RCRA Compliance Evaluation Inspections Credentials and Designation

To Whom It May Concern:

This certifies that Charles L. Willhite, whose signature appears below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the purpose of conducting RCRA Compliance Evaluation Inspection (CEI) for the period October 1, 1987 through December 31, 1987. This person is hereby authorized to conduct these official investigations pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA).

Section 3007(b) of RCRA and 40 CFR Part 2 define the Agency's policies regarding protection of trade secrets and confidential information.

> 39 Age:

> > uto 10-23-87

6'0" Height:

Weight: 175'

Color of Hair: red

Color of Eyes: blue

Charles L. illhite

Designated Contractor

Tetra-Tech

Carl V Blomgre David A. Wagoner, Director

Waste Management Division
U.S. Environmental Protection

Agency-Region VII



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

OCT 23 1987

RCRA Compliance Evaluation Inspections Credentials and Designation

To Whom It May Concern:

This certifies that Steven C. Freeman, whose signature appears below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the purpose of conducting RCRA Compliance Evaluation Inspection (CEI) for the period October 1, 1987 through December 30, 1987. This person is hereby authorized to conduct these official investigations pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA).

Section 3007(b) of RCRA and 40 CFR Part 2 define the Agency's policies regarding protection of trade secrets and confidential information.

Age:

27

Height:

6'4"

Weight: 173'

Color of Hair:

brown

Color of Eyes:

blue

Ereeman.

Designated Contractor

Tetrallech

David A. Wagoner, Directer

Waste Management Division

DR Waste management 2.
U.S. Environmental Protection

Agency-Region VII

ATTACHMENT B

Region VII Compliance Evaluation Inspection Checklist and Confidential Business Information (CBI) Forms

CFR, Part 262	RCRA COMPLIANCE INSPECTION REPORT GENERATOR'S CHECKLIST	Page 1/7
•	Section A - Hazardous Waste Determination	
	1. Does facility generate any wastes excluded from regulation (40 CFR 261.4)?	YesN
•	If yes, list wastes and quantities and explain ultimate disposition: Refuse and packing waste Ceder LANDFILL 160 4 D3 / mouth.	- NAMOS
	2. Does facility generate any wastes listed in Subpa D of 40 CFR Part 261?	rt Yes N
	If yes, list wastes and quantities: F0.03-20 F006-4400 kg/mo. F001-1700 kg/mo	5kg/ma,
	3. Does facility generate any wastes that exhibit a hazardous characteristic (Subpart C, 40 CFR Part 261)? <u>/</u> Yes
	a. If yes, list wastes and quantities: <u>Dool-</u>	100 Kg /mo
	 D. Was determination of characteristic made by: 1) Testing of wastes in accordance with meth in Subpart C, 40 CFR, Part 261? 	ods Yes_'N
	2) Applying knowledge of waste regarding mat or processes used?	eria) Ves_N
	4. Does facility generate any other solid wastes?	ves'N
	a. If yes, were wastes determined non-hazardous testing?	Yes_N
	b. If wastes were determined as non-hazardous by applying knowledge of wastes or processes, list waste and quantities generated (include processes used):	2S
	Section B - EPA Identification Number	
§262.12	Does generator have an EPA ID Number?	YesN
	1. If yes, EPA IU No: <u>IADOO819</u>	110
	If no, does facility meet small quantity generator requirements of 40 CFR, 261.5?	Yes No

Section C - Manifest

	1. Does generator ship wastes off-site? Yes No
	a. If no, do not fill out Sections C and D.
	<pre>b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet.)</pre>
§262.20	2. Does generator use manifests? Yes No
	a. If no, is generator a small quantity generator? // Yes No
§262.21	b. If yes, does manifest include the following information?
	1) Manifest Document No.
	2) Generators Name, Mailing Address, Telephone #YesNo
	3) Generator EPA I.D. NoYes'No
	4) Transporter(s) Name and EPA I.D. No. <a above="" according="" and="" applicable="" are="" certify="" classified,="" condition="" department="" described,="" epa."<="" for="" href="mailto://www.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.new.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.no.new.new.new.new.new.new.new.new.new.new</td></tr><tr><td></td><td>5)(a) Facility Name, Address and EPA I.U. No</td></tr><tr><td></td><td>Alternate Facility Name, Address and EPA 1.D. No., if any, or (optional) Instructions to transporter to return</td></tr><tr><td></td><td>wastes if undeliverable? (optional) <pre></td></tr><tr><td></td><td>6) Description of waste(s) required by DOT - proper shipping name, etc. Yes No</td></tr><tr><td>•</td><td>7) Total quantity of each waste by units (weight or volume), number and type of containers. Yes No</td></tr><tr><td></td><td>8) Emergency Information (optional) (special handling instructions, phone no.) Yes No</td></tr><tr><td></td><td>9) The following certification:</td></tr><tr><td></td><td>" in="" is="" labeled="" marked="" materials="" named="" of="" packaged,="" proper="" properly="" regulations="" td="" that="" the="" this="" to="" transportation="">
§262 .2 3	3. Does generator accomplish the following?
•	a. Sign and date each manifest?
	b. Obtain signed and dated copy of each manifest

	c. Retain one copy of manifest signed by generator	
•	d. Retain one signed copy of manifest from designated facility? Yes No	
	Section D - Recordkeeping and Records	
§ 262.40	1. Does generator keep the following reports for 3 years?	
	a. Signed copies of manifests from designated facilitiesYesNo	
	b. Annual/Biennial Reports	
	c. Exception Reports NAYesNo	
	d. Test Results, waste analysis, etc. Ves No	
	2. Where are records kept (at facility or elsewhere)? AT THE FACILITY MATERIALS LAB	•
:	3. Who is in charge of keeping the records? Name Jim TENSEN Title EPA COOPD,	
§262.50	Section E - Special Conditions	
	Has generator exported hazardous wastes to/from a foreign country?YesNo	
÷	a. If yes, has he filed a notice with the Regional Administrator?	
	b. Is this waste manifested and signed by ForeignYesNo	
	c. If generator transported wastes out of the country has he received confirmation of delivered shipment? YesNo	
	Section F - Pre-Transport Requirements	_
§262.30	1. Does Generator package waste in accordance with 49 CFR Parts 173, 178, and 179? (DOT requirements)YesNo	
§262.31	2. Does the Generator use DOT labeling requirements in accordance with 49 CFR Part 172? Yes No	
§262.32	3. Does the generator mark each package in accordance vith 49 CFR Part 172? Yes No	

	4. Is each container of 110 gallons or less marked with the following label? Yes No
• •	HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
•	Generator's Name and Address Manifest Document Number
§262.3	5. Does generator have placards to offer to transporters? Yes_No
	Section G - Accumulation Time
	Does generator accumulate wastes on-site for more than 90 days?YesNo
	a. If yes, has generator been granted an extension by proper authority? NA _Yes_No
	1) If yes, is extension for more than 30 days? YesNo
	2) If no, generator is an operator of a storage facility and is subject to the require- ments of 40 CFR Part 265. (Complete Facility's Checklist)
	b. If no, does generator accomplish the following:
	1) Places wastes in containers or tanks? Yes No
Note:	If containers are used, fill out checklist for containers. If tanks are used, fill out checklist for tanks (Items 55 & c are not applicable).
	2) Clearly marks each container with the date upon which each period-of accumulation begins? Yes_No
	3) Clearly marks or labels each container and tank with the words "Hazardous Waste"? Yes No
Note:	If generator accumulates wastes on-site for 90 days or less, complete Sections H, I, and J $$
•	Section H - Personnel Training
§ 265.16	8. Does facility have a training program? Are the following records maintained?

§265.33

3. Are all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, tested and maintained to assure proper operation?

§265.34	4. Are communications or alarm systems, where required, readily accessible?	Yes_	_No
§265.35	5. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?	Yes	No
§265.37	6. Has the owner/operator attempted to make the following arrangements with the local authorities as appropriate:	9	
•	a. To familiarize police, fire departments and emergency response teams with layout of facility, properties hazardous waste handled and associated hazards, places where personnel would normally be working, entrances to roads inside facility and possible evacuation routes?	of Yes_	_No
	b. In ther case where more than one police and fire department might respond, agreements designating primary emergency authority?	AYes	_No
	c. Agreements with State emergency response teams, emergency response contractors and equipment suppliers?	Yes	_No
	d. To familiarize local hospitals with the proper- ities of hazardous wastes handled and types of injuries or illnesses that would result?		 _No
·	7. Where state or local authorities decline to enter into such arrangements, is this documented in the operating record?	A_Yes_	_No
	Section J. Contingency Plan and Emergency Procedures	>• :	•
§265.52	1. Does the facility have a contingency plan?	Yes	_No
	a. Is it an amendment to a Spill Prevention Control and Countermeasures (SPCC) Plan?	Yes_ <i>V</i>	No
	b. Does the plan include:		
	1) Arrangements with local authorities to coordinate emergency services?	Yes_	_No
	2) List of names, addresses and phone numbers of emergency coordinators?	Yes_	_No
	3) List of all emergency equipment at facility?	Yes_	_No
•	4) Evacuation plan?	Yes	_No

	c. Is a copy of the contingency plan and all revi- sions:	
• • •	1) Maintained at the facility?	No
•	2) Submitted to all local authorities that may be called upon to provide services?	YesNo
§265.55	2. Is there an emergency coordinator on site or on call at all times?	Yes_No
	3. Have there been any incidents requiring the implementation of the contingency plan?	Yor Ala

RCRA COMPLIANCE INSPECTION REPORT CONTAINERS CHECKLIST

Subpart I 40 CFR Part	265	22	,
§265.171	1. Are all containers in good condition; i.e., not showing signs of leakage, corrosion or any other deterioration/ deformation?	Yes	_No
§265.172	2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that containers will not react with the hazardous wastes?	Yes	_No
§265.173	3. Are all containers holding hazardous wastes kept closed during storage?		No
§265.174	4. Are areas where hazardous wastes containers are stored inspected at least once a week?	Yes	No
	5. Is an inspection log maintained?	Yes/	No
§265 . 176	6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	Yes_N	0
§265.177	7. Are incompatible wastes or incompatible wastes and materials, placed in the same coontainer?	Yes N	0
	8. Are storage containers holding hazardous wastes which are incompatiable with nearby materials separator protected by means of a dike, berm, well or other device.	ted : <i>NH</i> YesNo	 0

Inspector: C. willhite 4 5. FREEMAN	
Address: LILA + STATE ALEANE	7
Telephone No: 9/3-621-604	_
1e1ephone No: $0/3 \sim 62/-604/$	

DRAFT RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

NDLER IDENTIFICATION	N		
SAUARE D COMPA	WY	37005.W.	6th. 3TREET t (or other identifier)
ndler Name	-	B. Stree	t (or other identifier)
EDAR TRAPIOS	FOWA	52404	LINN
ty	D. State	E. Zip Code	F. County Name
ANNFACTURE OF	MOLDED CASE CIRC	UIT BAEAKERS	
ture of Business; I	dentification of Operat	ions	
IAD 0008 19110)		
			•
JIM JENSEN	319-3	65-4631	
ndler Contact (Name	and Phone Number)		4
			·
ENERATOR COMPLIANCE			
- -Solvent Identifica	tion		•
,			•
. Does the handler	generate the following	wastes:	•
. F001		Yes No	i
. F002		Yes No	
. F003		Yes No	•
If an FOO3 waste	stream listed solely fo	or ignitability has	been mixed with a
non-restricted s	olid or hazardous waste	e, does the resultan	nt mixture exhibit the
ignitability cha			
. F004	· 	Yes No	
. F005		Yes No	
	- 0300 10	; Part A; Part	t B ;
	ANUFACTURE OF TURE OF Business; I TAD COOS 1911C ID # TIM JENSEN ANUFACTURE OF TURE OF Business; I TAD COOS 1911C ID # TIM JENSEN Adder Contact (Name ENERATOR COMPLIANCE Solvent Identifica Does the handler F001 F002 F003 If an F003 waste non-restricted signitability cha	ANUFACTURE OF MOLDED CASE CIRCLE OF Business; Identification of Operation of Table of ID# TIM JENSEN 3/9-3 Adder Contact (Name and Phone Number) ENERATOR COMPLIANCE Solvent Identification Does the handler generate the following F001 F002 F003 If an F003 wastestream listed solely for non-restricted solid or hazardous waste ignitability characteristic?	ANNIACTURE OF MOLDED CASE CIRCUIT BREAKERS ure of Business; Identification of Operations TAD COOR 19/10 ID # JM JENSEN 3/9-365-463/ INTERRATOR COMPLIANCE Solvent Identification Does the handler generate the following wastes? FO01 Yes No FO02 Yes No If an FO03 wastestream listed solely for ignitability has non-restricted solid or hazardous waste, does the resultar ignitability characteristic? FO04 Yes No Yes No Yes No

•		Handler Name: SQUARE DCo. ID Number: IAD 000 1910 Inspector: CWILLIE +5. FREEMAN Date: OCTOBER 29 1987
BDA	T Treatability Group - Treatment Standards Ide	ntification Comments
1.	Did the generator correctly determine the appropriate treatability group [268.41] of th waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)? Yes	e No
Vas	te Analysis	
1.	Did the generator determine whether the waste exceeds treatment standards based on [268.7(a	
	a. Knowledge of wastesYes	No
	b. TCLPYes	No
	c. Other (specify)	
	If knowledge, note how this is adequate: FROM INFORMATION OBTAINED ON THE M5D5	·
	If determined by TCLP, provide date of last t frequency of testing, and attach test results	
	Dates/frequency:	
	Note any problems:	· · · · · · · · · · · · · · · · · · ·
	d. Were wastes tested using TCLP when a procupation wastestream changed? NA Yes	
2.	Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?	NO DETERMINATION MARE
3.	Did the generator dilute the vaste or the tre residual so as to substitute for adequate tre [268.3]	a t men t
Man	agement	
1.	Onsite management	
	a. Were F-solvent wastes managed onsite?Yes	No
If	yes, answer 1(b) and (c); if no, answer 2.	

	Handler Name: <u>SQUARE D CO.</u> ID Number: <u>IAD 600 8 19110</u> Inspector: <u>C. WIII LITERY S. FREEMAN</u> Date: <u>OCTOBER 29, 1987</u>
b. For wastes that exceed treatment standa treatment, storage, and/or disposal con	ords, vas Comments
If yes, TSDF Checklist must be completed.	
c. Are test results maintained in the oper record [264.74(b)3/265.73(b)(3)]? //** //** //** //** //** //** //** /	
2. Offsite Management	
a. If F-solvent wastes exceed treatment st did generator provide treatment facilit [268.7(a)(1)]:	
(i) EPA vaste number? Ves	No
(ii) Applicable treatment standard?Yes	No
(iii) Manifest number? Yes	No
(iv) Waste analysis data, if available? Yes	
Identify offsite treatment facilities Fool+ HY0 CAEMICAL CO. FPA ID TAT 2000 10593,	IQITE .
b. If F-solvent wastes did not exceed trea standards, did generator provide the di facility [268.7(a)(2)]:	sposal
(i) EPA Hazardous vaste number? Yes	No
(ii) Applicable treatment standard? / Yes	No
(iii) Manifest number?	No.
(iv) Waste analysis data, if available?	No
(v) Certification that waste meets Y Yes	No
Identify land disposal facilities receiving the certified wastes	BDAT

		ID Ins	Number: <u> </u>	SQUARE SADADO C. Willhite OBER 29,	8 19110 e + 5.FR
· ·	If waste is subject to re [268.30] (e.g., solvent-than 1%), case-by-case expetition [268.6] does go to disposer that waste it disposal restrictions [268.6]	-water mixtures less extension [268.5] or enerator provide notic is exempt from land	e o		Comments
Storage	of F-Solvent Waste				
day	F-solvent waste stored is (after variance 180/2708.50(a)(1)]?		0		
			•		
status	was facility operating a or final permit? Checklist must be comple	as a TSD under interim	o		
status es, TSDF Treatme (i.e.,	or final permit?	as a TSD under interim	.		
Treatme (i.e., vasteva	Checklist must be completed by the complete of the Using RCRA 264/265 Exception of the Complete of the Complet	eted. empt Units or Processe llation units,	.		
Treatme (i.e., vasteva Vere tr from RC process	Checklist must be completed by the complete of the Using RCRA 264/265 Exception of the Complete of the Complet	eted. empt Units or Processe Clation units, Yes N Yes N	.		

U.S. ENVIRONMENTAL PROTECTION AGENCY RCRA INSPECTION CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) Charles L. Willhite STEVE FREEMAN SUITE SOG GATEWAY CENTER II 4th. & STATE AVENUE RAN. CITY, KAN. 66101	Name and Address of Facility 5QUARE D'COMPANY 3700 S.W. 6th, STREET CEDAR RAPIDS, TOWA 52404 Owner, Operator, or Agent in Charge BARBARA SINES Title PLANT MANAGER
Name of Individual to Whom Hotice Given BARBACA JIMES, PLANT MNGR.	Address 3700 Gth. St. J.W, CEPAR, RARIOS JOWA 52404 Title PLANT MNGR. 10-24-87

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets <u>all</u> of the following criteria:

- 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility	
	SQUARE	DCO.

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner Director, Waste Management Division United States Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

	·	
To be complete	ed by the facility official i	receiving this Notice:
I have receive	ed and read this Notice.	
Name B.J	. Sines	
	nt Manager	
Signature	Paxino	
Date 10/2	9/87	. ,
make business and other insp Agent in charge	confidentiality claims for t	facility who is authorized to the firm, a copy of this Notice nt to the Owner, Operator, or is another company official please designate below:
Name		· · · · · · · · · · · · · · · · · · ·
Title		
Address		

U.S. ENVIRONMENTAL PROTECTION AGENCY . 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual	Title Date
Firm Name	Firm Address

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)	Title	
Name of Inspector Title	Inspector's Signature	

ATTACHMENT C

Square D Company Notifications
July 30, 1980; November 12, 1980; June 2, 1983;
June 14, 1985; August 29, 1985; September 3, 1986

	INSTRUCTIONS: If you received a preprint label, affix it in the space at left. If any of
INSTALLA TION'S EPA	information on the label is incorrect, draw a through it and supply the correct information the appropriate section below. If the labe
NAME OF IN-	complete and correct/ leave Items I, ID and below blank. If you did not receive a pering
INSTALLA SQUARE D COMPANY* IL MAILING 3700 6TH ST SW ADDRESS CEDAR RAPIDS, IA 52404	label, complete all items. "Installation" mean single site where hazardous waste is general treated, stored and/or disposed of, or a traporter's principal place of business. Please to the INSTRUCTIONS FOR FROM NOT
LOCATION 3700 6TH ST SW	CATION before completing this florm, information requested herein is required by (Section 3010 of the Resource Conservation Recovery 1999.
FOR OFFICIAL USE ONLY	
C DATE RECEIVED	
INSTALLATION'S EPA I.D. NUMBER APPROVED (yr., mo., & day) \$ A D O O O 8 9 1 0 31 8 8 0 0 8 0	
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III. LOCATION OF INSTALLATION	
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自然的自身的特殊的 中央	
2 Rickard Allan WT Operator	3 1 9 3 6 5 4 6 3 1
V. OWNERSHIP	
C	
8 Square D Company	Control of the contro
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (en	nter "X" in the appropriate box(es))
F = FEDERAL OF M 197	UNDERGROUND INJECTION
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate in	box(es))
	R (specify):
A. AIR B. RAIL C. HIGHWAY D. WATER F. OTHER	ESTEROR SE DISTRICE
VIII FIRST OR SUBSEQUENT NOTIFICATION	vardous waste activity or a subsequent notifica
等的。 · · · · · · · · · · · · · · · · · · ·	rardous waste activity or a subsequent notificatelow.
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of haz If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided by	C. INSTALLATION'S EPA I.D.
VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of haz If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided by	C. INSTALLATION'S EPA I.D.

EPA Form 8700-12 (6-80)

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I certify under pe attached documen I believe that the mitting false inform	ts, and the	hat based or d information	n my inqu on is true,	uiry of tho accurate,	se individual	luals imme plete. I am	diately res	ponsible fo	r obtainin significan	g the infor t penalties	mation, for sub-
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EPA Form 8700-12 (6-80) REVERSE









UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII P.O. BOX 15606 KANSAS CITY, MISSOURI - 64106

TO: SQUARE D COMPANY

3700 6TH STREET S.W. CEDAR RAPIDS, IA 52401

EPA 1.D. No.: IAD000819110

RE: Regulated Facility, Permit-by-Rule

The Environmental Protection Agency (EPA) has received Part A of a permit application pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. The application demonstrates that the facility is one which is not required to submit a Part A application under Section 3005 of the Act. According to amendments made to the regulations on November 17, 1980, this facility will be granted a permit-by-rule and is only required to notify and comply with the new Part 266 regulations, which were proposed on November 17, 1980. This facility has been suspended from regulation under Parts 264 and 265.

If the facility referenced above is or, because of regulatory or process changes, becomes one which is required to have a permit under Section 3005 of the Act, a complete RCRA Part A Application (EPA Forms 3510-1 and 3510-3) must be completed and submitted to this office.

If you have any questions, please contact Dr. Jane Ratcliffe, State and Local Assistance Work Unit Leader at 816/374-6533.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII P. O. BOX 15606 KANSAS CITY, MISSOURI - 64106

ACKNOWLEDGEMENT OF APPLICATION FOR A HAZARDOUS WASTE PERMIT

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown in the box below, and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

EPA I.D. NUMBER

IAD000819410 SQUARE D COPPARY* 3700 6TH ST SW CEDAR RAPIDS

FACILITY ADDRESS

52404

Please print or type in the unshaded areas only fill in areas are spaced for elite type,	ters/inch).	Form Approv OMB No. 158-R0175
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Junttila Georg	e Plant Engineer	3 1 9 3 6 5 4 6 3 1
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C. STATUS OF OPERATOR (Enter the appropriate to F = FEDERAL M = PUBLIC (other than federal of			E	(area code & no.)
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treatment, storage, or disposal facilities, and each water bodies in the map area. See instructions for p	well where it injects t	luids underground.	include all springs, rivi	ers and other surface
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XIII. CERTIFICATION (see Instructions)				
I certify under penalty of law that I have persona	lly examined and am f	amiliar with the info	rmation submitted in a	this application and all
attachments and that, based on my inquiry of tapplication, I believe that the information is true	accurate and comple	te. I am aware that	there are significant p	enalties for submitting
false information, including the possibility of fine	and imprisonment.			C. DATE SIGNED
A. NAME & OFFICIAL TITLE (type or print) Roger A. Sackett	B. SIGNATURI	16		
Roger A. Sackett Vice President	Koga	A Sache	U	11/12/80
COMMENTS FOR OFFICIAL USE ONLY		a removal displace interests assured moneys become some		
C.			تعد فرق فرق المراز	

EPA Form 3510-1 (6-80) REVERSE

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	ESIGN CAPACITY — For each coo	de entered in colur	nn A enter	the cap	acity of th	e process.					
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EXAMPLE FOR	R COMPLETING ITEM III (shown	in line numbers X	-1 and X-2	below	: A facilit	y has two st	orage tanks, one	tank can ho	ld 200 gall	ons and	the
other can hold	400 gallons. The facility also has a	n incinerator that	can burn up	to 20	gallons per	r hour.		1 /	<u> </u>	<u> </u>	<u> </u>
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IV DESCRIPTION	OF HAZARDOUS WASTE	S		
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355 (35) (32)	ic contaminants of those hazard	lieted waste entered in	column A estimate the quantil	ty of that waste that will be handled on an annual
basis. For each ch	aracteristic or toxic contaminant characteristic or contaminant.	t entered in column A es	timate the total annual quantity	y of all the non-listed waste(s) that will be handled
UNIT OF MEASU	RE — For each quantity entere	ed in column B enter th	e unit of measure code. Units	of measure which must be used and the appropriate
ENG	LISH UNIT OF MEASURE	CODE		K
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If facility records account the appro	use any other unit of measure priate density or specific gravity	for quantity, the units of the waste.	of measure must be converted in	nto one of the required units of measure taking into
PROCESSES 1. PROCESS CO	OFS:			
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For non-liste contained in	I hazardous wastes: For each of tem III to indicate all the production	haracteristic or toxic co	entaminant entered in column	A, select the code(s) from the list of process codes of all the non-listed hazardous wastes that possess
Blates Easy	stic or toxic contaminant. paces are provided for entering pox of Item IV-D(1); and (3) En	g process codes. If more	e are needed: (1) Enter the fire	st three as described above; (2) Enter "000" in the d the additional code(s).
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PAGE 2 OF 5

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EPA Form 3510-3 (6-80)

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E. USE THIS SPACE TO LA ADDITIONAL PRO	CODES FROM ITEM D(1) ON P	AGE 3.	
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TAD TAG			
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V. FACILITY DRAWING All existing facilities must include in the space provided on	p page 5 a scale drawing of the facility (see in	structions for more detail).	
I. PHOTOGRAPHS	Poge of a section of the section of		
All evicting facilities must include photographs (age	rial or ground—level) that clearly deline	ate all existing structures; existing	g storage,
treatment and disposal areas; and sites of future sto	orage, treatment or disposal areas <i>(see in</i>	nstructions for more detail).	
II. FACILITY GEOGRAPHIC LOCATION		NGITUDE (degrees, minutes, & secon	del delle sitte sitte
LATITUDE (degrees, minutes, & second	is)	INGITUDE (aegrees, minutes, & secon	
4 1 5 6 3 0 N		0 9 1 4 0 5 2 W	
VIII, FACILITY OWNER			
X A. If the facility owner is also the facility operator as	s listed in Section VIII on Form 1, "General	Information", place an "X" in the box	to the left and
skip to Section IX below.			
B. If the facility owner is not the facility operator as	s listed in Section VIII on Form 1, complete	the following items:	and the second second
	The second secon		O. (area code & no.)
1. NAME OF FAC	ILITY'S LEGAL OWNER		
J		55 56 - 58 59	- 61 62 - 65
15 16 3. STREET OR P.O. BOX	4. CITY OR TOW	N 5. ST. 6	. ZIP CODE
	G		
15 16	45 15 16	40 41 42 47	
IX. OWNER CERTIFICATION		formation submitted in this and	all attached
I certify under penalty of law that I have personall documents, and that based on my inquiry of those	s individuals immediately responsible to	ir optairiilly the iniormation, i bei	icio mar and
submitted information is true, accurate, and comp	lete. I am aware that there are significa	nt penalties for submitting false ir	nformation,
including the possibility of fine and imprisonment.			
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNE	D
Roger A Sackett	Roga A Suches	11/12/8	0
X, OPERATOR CERTIFICATION		nformation submitted in this and	all attached
I certify under penalty of law that I have personal documents, and that based on my inquiry of those	a individuale immediately responsible it	ir mmaiininu tile mitormation, i bo.	lious that the
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CIRCUIT BREAKER DIVISION LINCOLN PLANT

402 - 423-6721



1717 CENTERPARK ROAD P.O. BOX 80667

LINCOLN, NEBRASKA 68501

April 15, 1981



MAY 7 1981

Administrator 324 East 11th Street Kansas City, Missouri 64106 **ENFORCEMENT DIVISION**

Dear Sir:

On Monday, November 17, 1980, EPA published amendments to its hazardous waste rules that suspended the requirement that owners and operators of wastewater treatment facilities, which treat hazardous waste in tanks and are subject to regulation under Sections 402 or 307 (b) of the Clean Water Act, obtain a permit under RCRA.

Prior to the publication of these amendments in the <u>Federal Register</u>, our facility had submitted a Part A Permit Application for our hazardous waste treatment activities as required by the regulations at that time. However, as our treatment plant falls within the aforementioned amendment, we are no longer required to maintain "interim status" in order to continue our treatment operation. Therefore, we are requesting that you withdraw our Part A Permit Application with regard to our treatment facility.

In addition, we also have and plan to continue to work within the 90-day limitation on storage of hazardous waste "on-site." As this also does not require a RCRA permit under the regulations, we are requesting that you withdraw our Part A Permit Application for our storage facility.

Please acknowledge receipt of this letter by date stamping the enclosed copy and returning it to the undersigned in the stamped, self-addressed envelope. In addition, we would request acknowledgement from you when the withdrawal process has been completed.

Sincerely,

Square D Company

Bill Woito

EW/pw

cc: Permit Contact State of Nebraska DEC

Code as permit-by-rule-JFor CIRCUIT BREAKER DIVISION 6/17/81

(319) 365-4631



SIXTH STREET, S. W. 3700

CEDAR RAPIDS, IOWA 52406

April 24, 1981

Permit Branch U.S. Environmental Protection Agency 324 East 11th Street Kansas City, Missouri 64106

FAD000819110.

Dear Sir:

On Monday, November 17, 1980, EPA published amendments to its hazardous waste rules that suspended the requirement that owners and operators of wastewater treatment facilities, which treat hazardous waste in tanks and are subject to regulation under Sections 402 or 307 (b) of the Clean Water Act, obtain a permit under RCRA.

Prior to the publication of these amendments in the Federal Register, our facility had submitted a Part A Permit Application for our hazardous waste treatment activities as required by the regulations at that time. However, as our treatment plant falls within the aforementioned amendment, we are no longer required to maintain "interim status" in order to continue our treatment operation. Therefore, we are requesting that you withdraw our Part A Permit Application with regard to our treatment facility.

In addition, we also have and plan to continue to work within the 90-day limitation on storage of hazardous waste "on-site." As this also does not require a RCRA permit under the regulations, we are requesting that you withdraw our Part A Permit Application for our storage facility.

IN 55 1881 Please acknowledge receipt of this letter by date stamping the enclosed copy and returning it to the undersigned in the stamped, self-addressed envelope. In addition, we would request acknowledgement from you when the withdrawal process has been completed.

Very truly yours,

George E. Junttila

MAY 0 1 1981

ne

Region VII K.C..

Enclosures



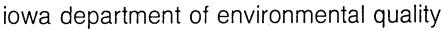
Copies to: EPA Regional VII

P. O. Box 15606

Kansas City, Missouri 64106

Charles C. Miller, Director Iowa Department of Environmental Quality Air and Land Quality Division Henry A. Wallace Building Des Moines, Iowa 50319





File Name

Senders Initials

reply to: Eugene N. Evans - Main Office phone: 515/281-8978

May 23, 1983

CERTIFIED LETTER

Mr. Glenn A. Brock Square D Company 3700 6th St. SW Cedar Rapids, IA 52406

RE: Square D Company

EPA ID No. IAD000819110

Dear Mr. Brock:

This letter is to request clarification of your current status in the hazardous waste management system. Inconsistencies were noted when comparing information submitted on the original hazardous waste forms with your February 25, 1983. annual report.

The following were noted:

- 1) On the original forms, the contact person was Allen Rickard. Your name was listed on the annual report.
- 2) On the original, the zip code was 52404 and on the annual report the zip code is 52406.
- 3) On the original forms, the waste codes were F001, F002, F003, F006, and F009. On the annual report, only F001, F003, F006 appeared.

If the original information is in error, you must correct it by completing and signing the attached EPA form 8700-12 (6-80). Within 15 days of receipt of this letter, please submit the amended form or identify why no change is necessary.

Sincerely,

PROGRAM OPERATIONS DIVISION

Robert E. Campbell, P.E. Chief, Air & Waste Permits Branch

REC: ENE: mla/D38/W136F11.01

cc: Jack Coakley, EPA Region VII DEO Region 1

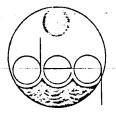


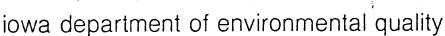
RECORD COPY Square D

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

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COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WAstance your installation handles which may be a hazardous was a company of the company	STES. Enter the four-digit number vaste. Use additional sheets if necess	from 40 CFR Part 261.33 fo ary.	r each chemical sub-
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X. CERTIFICATION			Post of the same
I certify under penalty of law that I have personal	ly examined and am familiar w		
attached documents, and that based on my inquiry I believe that the submitted information is true, acmitting false information, including the possibility of	curate, and complete. I am awa	e that there are significa	nt penalties for sub-
GNATURE	NAME & OFFICIAL TITLE (type of	r print)	DATE SIGNED
C. E. Ashley	C. E. Ashley Plant Manager		6-2-83
PA Form 8/00-12 (6-80) REVERSE			

No. of Lot, House, St. Lines, St. Lines, Lot, House, L





reply to Eugene N. Evans - Main Office phone 515/281-8912

CERTIFIED MAIL

May 23, 1983

Mr. Maurice H. Phillips The Vernon Company 604 W. 4th St. N Newton, IA 50208

RE: Vernon Company, The

EPA ID No. IAD005276381

Dear Mr. Phillips:

This letter is to request clarification of your current status in the hazardous waste management system. Inconsistencies were noted when comparing information submitted on the original hazardous waste forms with your February 22, 1983 annual report.

The following were noted:

On the original forms, the hazardous waste codes F003 and F005 were listed. Only F003 appeared on the annual report. Your attention is directed to the attached regulations regarding paint wastes, the recycle regulations, and the "small quantity exclusion regulations."

If the original information is in error, you must correct it by completing and signing the attached EPA form 8700-12 (6-80). Within 15 days of receipt of this letter, please submit the amended form or identify why no change is necessary.

Sincerely,

PROGRAM OPERATIONS DIVISION

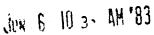
Robert E. Campbell, P.E. Chief, Air & Waste Permits Branch

REC:ENE:mla/AWPW139F12.01

cc: Jack Coakley, EPA Region VII

DEQ Region 5

RECEIVED





EQUIPMENT

DEPARTMENT ENVIRONMENTAL GUALITY

BREAKER CIRCUIT

(319) 365-4631



STREET, S. W. 3700 SIXTH

IOWA CEDAR

CERTIFIED MAIL

June 1, 1983

Mr. Eugene N. Evans Henry A. Wallace Building Des Moines, Iowa 50319

RE: Mr. Robert E. Campbell's

Letter of 5/23/83 (copy attached)

Dear Mr: Evans:

In his letter Mr. Campbell noted three (3) inconsistencies when comparing our annual report with the original Notification of Hazardous Waste Activity.

Clarification of these discrepancies follows:

- On the original form, the contact person was Allen Rickard. My name was listed on the annual report.
 - Comment Allen Rickard is in charge of our electroplating wastewater treatment operation and was listed on the initial filing. All environmental correspondence is handled by me, resulting in a name change on the annual report. A subsequent notification form 8700-12 is enclosed listing my name as the installation contact.
- On the original, the zip code was 52404 and on the annual report the zip code is 52406.
 - Comment Both zip codes apply to this installation. The 52406 zip code is correct for all correspondence. Shipments to the plant would use zip code 52404. This error was on the original preprinted label and not corrected. The enclosed subsequent notification form also makes this correction.

On the original forms, the waste codes were F001, F002, F003, F006, and F009. On the annual report, only F001, F003, F006 appeared.

Comment - When we filed the original notification we included codes with a remote possibility of being generated.

However, the F002 and F009 were not generated, consequently they did not show on the annual report.

These two waste codes are not included on the subsequent notification enclosed.

If you require additional information please contact me.

Sincerely yours,

Glenn A. Brock

Environmental Coordinator

ne

att:enc

cc: C. E. Ashley - Square D
 Jack Coakley, EPA Region VII
 DEQ Region I
 L. R. Wiegand - Square D

SQUARE D COMPANY

file

CIRCUIT BREAKER DIVISIO

(319) 365-4631



3700 SIXTH STREET, S. W.

CEDAR RAPIDS, IOWA 52406

June 14, 1985

Chet McLaughlin United States Environmental Protection Agency Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Dear Chet:

Enclosed you will find the updated Resource Conservation and Recovery Act Notification Form. The form includes notification of the silver acid stripping solution as per your letter of May 16, 1985. I checked the corrosive characteristic in Section IX Part E for non-listed hazardous waste as the best description of the stripping solution. I have also changed the name of the installation contact in section IV from Glenn Brock, who has retired, to James Jensen. If you have any questions or need more information please contact me at your convenience.

Yours truly,

James C. Jensen

ne

CC: Gene Evans - IDWAWM Carl Ashley - PM Pat Kelley - PS

RECEIVED

JUN 1 7 1985

STPG SECTION

CONTINUE ON REVERSE

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certify under penalty of attached documents, and the I believe that the submitted nitting false information, in CS Achille	hat based on my inqual information is true, acluding the possibility	iry of those individ accurate, and comp of fine and impriso	uals immediately respondence that on ment. AL TITLE (type or print)	ponsible for obtains t there are significa	ing the information,

. - FOR OFFICIAL USE ONLY

w



department of water, air and waste management

File

June 18, 1985

Mr. James C. Jensen **Environmental Coordinator** Square D Company 3700 Sixth Street, S.W. Cedar Rapids, IA 52406

Facility Status/Changes

Square D Company EPA ID #IAD000819110

Dear Mr. Jensen:

This letter is to acknowledge receipt of your updated Hazardous Waste Notification Form. This Department approves the following changes in your facility's record.

- Addition of Hazardous Waste number D002 for the silver acid stripping solution.
- Facility installation contact change to James Jensen.

If you have any question, please contact Linda Reding at 515/281-8959.

Sincerely,

PROGRAM OPERATIONS DIVISION

Robert E. Campbell, P.E.

Chief, Air & Waste Permits Branch

REC:ER:ss

cc: Region 6

Pat Ritchey, U.S. EPA, Kansas City, Kansas

RECEIVED

JUN 1 9 1985

USEPA, RCRA Branch



(319) 365-4631



3700 STREET, S. W.

CEDAR IOW A 52406

August 29, 1985

Chet McLaughlin United States Environmental Protection Agency Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Dear Chet:

Enclosed you will find a updated EPA notification of Hazardous Waste Activity form. This form is to notify the agency of the use of Safety Kleen's parts washer solvent. This solvent is ignitable. I have marked the DOOl ignitable box under Section IX, Part E for non-listed hazardous waste. If you have any question or need more information please contact me at your convenience.

Yours truly.

ames C/Jensen

ne

cc: C. E. Ashley - PM

R. K. Chown - PS

KECEIVED SEP 03 1985 IJSEPA, RCRA Branch

SEPA	NOTIFICATION OF HAZARDOUS WASTE ACTIVIT	Y INSTRUCTIONS: If you received a preprin
INSTALLA	the first of the second	label, affix it in the space at left. If any of information on the label is incorrect, draw a !
TION'S EPA I.D. NO.	* IAD000819110	through it and supply the correct informat in the appropriate section below. If the labe
l. STALLATION	SQUARE D COMPANY* 3700 6TH ST SW	complete and correct, leave Items 1, 11, and below blank. If you did not receive a preprin label, complete all items, "Installation" mean
INSTALLA- TION II. MAILING ADDRESS	CEDAR RAPIDS, IA 52404	single site where hazardous weste is generat treated, stored and/or disposed of, or a tra porter's principal place of business. Please re
LOCATION LATION	3700 6TH ST SW CEDAR RAPIDS, IA 52404	to the INSTRUCTIONS FOR FILING NOTI CATION before completing this form. I information requested herein is required by I (Section 3010 of the Resource Conservation a Recovery Act).
FOR OFFICIAL	ISF ONLY	
	COMMENTS	
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IV. INSTALLA	TION CONTACT NAME AND TITLE (last, first, & Job Hitle)	PHONE NO. (area code & no)
JAMES	C JENSEN ENV COORDINA	TOR319.365.4631
V. OWNERSHIE	Sometimes of the company of process of the second of the second	(a) (a) (b) (b) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
(A. NAME OF INSTALLATION'S LEGAL OWNER	
	RE D COMPANY	
(enter the approp	route letter into box; VI. TYPE OF HAZARDOUS WASTE ACTIVI	
F - FEDERA	AL ST GENERATION ST G. TREAT/STORE/DISPOSE	B. TRANSPORTATION (complete item VII) D. UNDERGROUND INJECTION
VII. MODE OF	TRANSPORTATION (transporters only - enter "X" in the approp	riale box(es))
A. AIR		OTHER (specify):
VIII. FIRST OF	R SUBSEQUENT NOTIFICATION	ENERGY TO THE WAR TO SHAPE TO THE TOTAL PROPERTY OF THE PARTY OF THE P
Mark "X" in the a If this is not your	appropriate box to indicate whether this is your installation's first notification first notification, enter your Installation's EPA I.D. Number in the space pro	n of hezardous waste activity of a subsequent notifical vided below.
	·	C. INSTALLATION'S EPA I.D.

A. FIRST NOTIFICATION

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C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS V stance your installation handles which may be a hazardou	VASTES. Enter the four—digit number from 40 CFR Pert 281.33 is waste. Use additional sheets if necessary.	for each chemical sub-
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 D. LISTED INFECTIOUS WASTES. Enter the four-digit no hospitals, medical and research laboratories your installation. 	umber from 40 CFR Part 261.34 for each listed hazardous waste fron handles. Use additional sheets if necessary.	rom hospitals, veterinary
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attached documents, and that based on my inquiry	illy examined and am familiar with the information submoon of those individuals immediately responsible for obtain curate, and complete. I am aware that there are significal fine and imprisonment.	ing the information
SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
CElephley	Plant Manager	8-29-85

I.D. - FOR OFFICIAL USE ONLY



CIRCUIT BREAKER DIVISION

(319) 365-4631



3700 SIXTH STREET, S.W. CEDAR

CEDAR RAPIDS, IOWA 52406

September 3, 1986

Ken Herstowski, RCRA/Iowa EPA Region 7 726 Minnesota Avenue Kansas City, KS 66101

Dear Ken:

Enclosed you will find an updated notification form. This form makes the following changes:

- 1. Changes the contact name from Glenn A. Brock, Env. Coordinator to James Jensen Env. Coordinator.
- 2. Marked box number l ignitable in section IX part E of the notification form. This is to cover the non-listed solvent we use from Safety-Kleen to clean parts.
- 3. Marked box number 2 corrosive in section IX part E of the notification form. This is to cover the non-listed acid silver stripping solution that we have used.

I notified the EPA in Kansas City by letter with a notification form attached of all three changes. The letters were sent to Chet McLaughlin and were dated June 14, 1985 and August 29, 1985.

If you have any questions or you need more information, please contact me at 319-365-4631.

Yours truly,

James C. Jensen

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O.M. PATTON

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a. SUBSEQUENT NOTIFICATION (complete (tem C)

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

A. FIRST NOTIFICATION

CONTINUE ON REVERSE

A. NAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 281.31 for each listed hazardous wester from non-specific sources your installation handles. Use additional sheets if necessary.	IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front) A HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-delight number from 40 CFR Part 281.31 for each listed hazardous wester from non-specific sources your installation handles. Use solitional sheets if receivably. B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-delight number from 40 CFR Part 281.32 for each listed hazardous wastes from specific industrial sources your installation handles. Use solitional absets if receivably. B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-delight number from 40 CFR Part 281.32 for each chemical subspecific industrial sources your installation handles. Use solitional absets if receivably. C. COMMERCIAL CREMICAL PRODUCT MAZARDOUS WASTES. Enter the four-delight number from 40 CFR Part 281.33 for each chemical subspecific industrial sources your installation handles which may be a hazardous wests. Use additional absets if receivably. C. COMMERCIAL CREMICAL PRODUCT MAZARDOUS WASTES. Enter the four-delight number from 40 CFR Part 281.33 for each chemical subspection of the part of the	LD FOR OFFICIAL USE ONLY .,
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	0-2-86	attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.
SIGNATURE	Plant Manager 7.5.00	0-2-86

EPA Form 8700-12 (6-80) REVERSE

ATTACHMENT D

Square D Company Material Safety Data Sheets

Beed 11/11/85

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved Go GMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

			Health Regulations for Ship Repairing, king (29 CFR 1915, 1916, 1917)		
The off-verse waste version	nis	SEC	CTION	200	
MANUFACTURER'S NAME	STATE AND	and the second second	EMERGENCY TELEPHONE NO.	5- THE CO.	n
Safety-Kleen Corporation	Newsweller golding		312/697-8460	E T ST	ing in the second
	L 60	120		t and the second	63.33
CHEMICAL NAME AND SYNONYMS Mineral Spirits	ggiffentioner, a tw	o province design consequences and the	THADE NAME AND SYNONYMS Safety-Kleen 105 Solvent-M	S	
Petroleum Hydrocarbon Fractio	n	2.4715	SK Part #6617	and extending	Segra parameter
SECT	ION I	-HAZA	ARDOUS INGREDIENTS	10 Bus	
PAINTS, PRESERVATIVES, & SOLVENTS		TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS	- Copper		BASE METAL RUDING YOU LINN	1.45	(Orins)
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VEHICLE			METALLIC COATINGS		and the same of th
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ADDITIVES Dye	.00	3 100	OTHERS	77-491	1-, -
OTHERS Anti-Static Additive	1pp	an .	The serious series of the seri		wi so
HAZARDOUS MIXT	URES O	FOTHER UC	QUIDS, SOLIDS, OR GASES	%	TLV (Units)
zacijajupen Tenebst no	atei		of to eccordance with company or ic	198	C273.67
	7		conter sain conditions	0.74 %	i i mi
e en					
	General			N. Marie Co., Co.	
	SECT	ION III—	PHYSICAL DATA		AND S
BOILING POINT (°F.)	310)-4000F	SPECIFIC GRAVITY (H ₂ O=1)	775	-0.79
VAPOR PRESSURE (mm Hg.)	m Hg	90 68 ⁰ F	PERCENT, VOLATILE BY VOLUME (%)	1	00%
VAPOR DENSITY (AIR=1)	kor:	4.9	CONTINUE LANG TO SEED IT SEVO	0	.02
SOLUBILITY IN WATER	Negi	igible	· 医克朗氏性结束 (1997) · · · · · · · · · · · · · · · · · · ·	ALC: U.S. E.	an 169
APPEARANCE AND ODOR Green Clear	*****	Andrew All Common		esetty stee na	spaniero e restato en
SECTION	V—F	IRE AND	EXPLOSION HAZARD DATA		
FLASH POINT (Method used) 1050 F TCC	46.80	nema bi	FLAMMABLELIMITS - Let of	asety.	Ugl
	chen	nical, n	water (mist only)	0	.0
		and the second s			
UNUSUAL FIRE AND EXPLOSION HAZARDS None		2,6 %	- 658 OPD		

SECTION V-HEALTH HAZARD DATA HOLD LIMIT VALUE 100 ppm roceronal Satetis and Haylin Administration Severe eye irritation - drying of skin - excessive inhalation causes headache. dizziness and nausea. Harmful or fatal if swallowed. EMERGENCY AND FIRST AID PROCEDURES EYE CONTACT: flush with water. SKIN CONTACT: wash with mild soap/water, and apply INHALATION: remove to fresh air and call a physicial. Apply artificial respiration if necessary in extremes. ORAL: administer plain water--DO NOT INDUCE VOMITING. Call a physician. 0045-TE0\SIC SECTION VI - REACTIVITY DATA STABILITY CONDITIONS TO AVOID UNSTABLE STABLE Heat, sparks, open flame and fire. INCOMPATABILITY (Ma Strong oxidizing agents. HAZARDOUS DECOMPOSITION PRODUCTS Normally none--however, incomplete burning may yield carbon monoxide. CONDITIONS TO AVOID MAY OCCUR THE WAR EYOLIA POLYMERIZATION WILL NOT OCCUR ALLONGS SECTION VII SPILL OR LEAK PROCEDURES STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Catch and collect for recovery as soon as possible. Avoid exposure to sparks, fire or hot metal surfaces. arkithha browsa link RESARCHUR MINTURES OF OTHER LIQUIDS BOILDS OR GASES WASTEDISPOSAL METHOD Dispose of in accordance with company or local, state or federal regulations. Incinerate under safe conditions.

kangana ang mang samungka .	SECTION VIII	-SPECIAL PROT	ECTION INFORMATION	and the second
RESPIRATORY PROTE	CTION (Specify type)	this too conce	ntrations above TLV	Ninte
VENTILATION	Normal room vent		SPERM	The state of the s
1001	MECHANICAL (General)		THE THE THE OTHER	STEENER WITH STATE OF
PROTECTIVE GLOVES USe protecti	In case of prolong we gloves or barrie	ed contact Ex	PROJECTION YES Non	mal precautions.
OTHER PROTECTIVE E	QUIPMENT	221260636373	Mikrosch	

SECTION IX—SPECIAL PRECAUTIONS	Mar.
Combustible. Keep away from heat sparks and open flame. Use adequate ventilation	on.
avoid long and repeated contact with skin. If clothes are inadvertently saturate	ed
with solvent do not smoke keep away from ignition source. Keep out of read	ch
of children.	

PAGE (2)

GPO 934-110

Form OSHA-20 Rev. May 72

fee, 3700



HYDRITE CHEMICAL CO. 2655 N. MAYFAIR ROAD MILWAUKEE, WI 53226

MATERIAL SAFETY DATA SHEET

CS-2008

1-1-1 TRICHLOROETHANE

PAGE 1

DISTRIBUTED BY:

HYDRITE CHEMICAL CO. 2655 N. MAYFAIR ROAD

MSDS#:HY863CS2008XX

MILWAUKEE, WI 53226

(414) 257-2300 (414) 277-1311

PREPARED BY:LMT/JRS

05/12/86

MANUFACTURED BY: Vulcan; PPG; Agrandi; ICI

SECTION I - PRODUCT INFORMATION

TRADE NAME: 111-Trichloroethane CHEMICAL NAME & SYNONYMS: Methyl Chloroform

C.A.S. REGISTRY #: 71-55-6

CHEMICAL FAMILY: Chlorinated Hydrocarbon

FORMULA: CH3CC13

DOT PROPER SHIPPING NAME: 1-1-1 TRICHLOROETHANE

D.O.T. HAZARD CLASS: ORM A

D.O.T. IDENTIFICATION #: UN2831 D.O.T. LABEL: Chlorinated

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT

PERCENT

TLV LEVEL

PEL LEVEL

1,1,1-Trichloroethane

Stabilizers

> 95.5% 350 ppm 350 ppm Not Estab. Not Esta

Not Estab.

NOTE: Stabilizers may include: Diethylene ether, Glycol methylene ether, and/or Sec-Butanol. NOTE: Hazard information is based upon the tested mixture and not individual ingredients.

SECTION III - PHYSICAL DATA

BOILING POINT (DEG. F): 165.4 SPECIFIC GRAVITY: 1.3 FREEZING POINT (DEG.F): -49 PERCENT VOLATILE

VAPOR PRESSURE (MM HG): 135 @ 25 C BY VOLUME%: 100 %



MATERIAL SAFETY DATA SHEET

CS-2008 1-1-1 TRICHLOROETHANE PAGE 2

SECTION III - PHYSICAL DATA

VAPOR DENSITY (AIR=1): 4.6 EVAPORATION RATE(Ether): 0.4 SOLUBILITY IN WATER: Negligible

APPEARANCE AND ODOR: Clear, colorless liquid. Typical Hydrocarbon odor.

SECTION IV - FIRE & EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED): None.

FLAMMABLE LIMITS LEL: 7

UEL: 15

EXTINGUISHING MEDIA: Water spray. Dry Chemical. Carbon Dioxide.

SPECIAL FIRE FIGHTING PROCEDURES: Evacuate area of unprotected personnel. Wear protective clothing including a NIOSH-Approved self-contained breathing apparatus. Cool fire-exposed containers with water spray. Run-off from fire control may cause pollution.

UNUSUAL FIRE & EXPLOSION HAZARDS: Concentrated vapors can be ignited by high intensity heat source. Product may thermally decompose to produce Hydrogen Chloride vapors and possibly traces of Phosgene.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 350 ppm (OSHA 29 CFR 1910.Z) 350 ppm (ACGIH 1985-86)

EFFECTS OF OVEREXPOSURE

EYE CONTACT: Short term liquid or vapor contact may result in slight irritation. Prolonged or repeated contact may be more irritating. Permanent eye damage may result.



MATERIAL SAFETY DATA SHEET

CS-2008

1-1-1 TRICHLOROETHANE

PAGE

SECTION V - HEALTH HAZARD DATA

SKIN CONTACT: May cause mild irritation to skin. Prolonged and repeated contact with skin can cause defatting and drying of the skin which may result in skin irritation and dermatitis.

INHALATION: High concentrations or prolonged exposure to lower concentrations may be slightly irritating to mucous membranes. Inhalation overexposure can lead to central nervous system depression producing effects such as headaches, nausea, dizziness and loss of consciousness.

INGESTION: Liquid ingestion may result in vomiting; aspiration (breathing in of liquid into the lungs) must be avoided as liquid contact with the lungs can result in chemical pneumonitis and pulmonary edema/hemorrhage. Large amounts may be fatal.

OTHER: Reports of animal test studies have shown possible effects to: the liver. The relevance of these effects to man is unknown.

EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT: Immediately flush eyes with plenty of water for at least 15 minutes. Hold eyelids open during this flushing with water. Call a physician immediately.

SKIN CONTACT: Flush area with water while removing contaminated clothing and shoes. Follow by washing with soap and water. Do not reuse clothing or shoes until cleaned. If irritation persists, get medical attention. Do not apply oils or ointments unless ordered by the physician.

INGESTION: If conscious, drink a quart of water. DO NOT induce vomiting. CALL A PHYSICIAN immediately. If unconscious or in convulsions, take immediately to a hospital or a physician. NEVER induce vomiting or give anything by mouth to an unconscious victim. INHALATION: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. CALL A PHYSICIAN. Do not give stimulants unless instructed to do so by a physician.

OTHER: ADDITIONAL NOTES TO PHYSICIAN: Chlorinated Solvent. Never administer adrenalin following overexposure. Increased sensitivity



MATERIAL SAFETY DATA SHEET

CS-2008	1-1-1 TRICHLOROETHANE	PAGE 4
	SECTION V - HEALTH HAZARD DATA	
of the he	eart to adrenalin may be caused by overexposur	e to solvent.
	SECTION VI - REACTIVITY DATA	
STABILITY: CONDITIONS flame.	X STABLE UNSTABLE TO AVOID: Avoid contact with heat, sparks, an	d open
INCOMPATABI	LITY: Strong Oxidizing Agents. Alkalies. Alum	inum.
Carbon Mo	ECOMPOSITION PRODUCTS: May thermally decomposinoxide, Carbon Dioxide, Hydrogen Chloride vapand unidentifiable organic materials.	e to form ors, traces of
HAZARDOUS PO	OLYMERIZATION:MAY OCCUR _X_WILL NOT	OCCUR
	SECTION VII - SPILL OR LEAK PROCEDURES	
Elimina from area Equipment up residu non-leakin with waten	TAKEN IN CASE MATERIAL IS RELEASED OR SPILLE te all sources of ignition. Evacuate unprotec. Maintain adequate ventilation. Use proper S. Contain spill, place into drums for proper e with non-flammable absorbent material. Placing containers for immediate disposal. Flush rr to remove trace residue and dispose of propscharge to sewers and surface waters. Notify urs.	ted personnel afety disposal. Soak e in emaining area erly. Avoid
Dispose of Reclaim (1 solder, di	SAL METHOD: Observe all Local, State, and Fed f at approved Landfill Site or Waste Treatmen recycle) solvent. DO NOT pressurize, cut, wel rill, grind or expose empty containers to hea other sources of ignition. EPA-RCRA Hazardou	t Facility. d, braze, t. flame.
	SECTION VIII - SPECIAL PROTECTION INFORMATIO	 N
		~~~~~~~~~~~~~~



#### MATERIAL SAFETY DATA SHEET

1-1-1 TRICHLOROETHANE PAGE 5 SECTION VIII - SPECIAL PROTECTION INFORMATION CONSULT SAFETY EQUIPMENT DISTRIBUTOR RESPIRATORY PROTECTION: If TLV is exceeded wear: NIOSH-Approved self-contained breathing apparatus. NIOSH-Approved organic respirator. VENTILATION: Maintain adequate ventilation. Keep levels below recommended TLV. Avoid mist formation. PROTECTIVE GLOVES: Polyvinyl Alcohol. EYE PROTECTION: Chemical Safety Goggles. Face shield. Do not wear contact lenses. OTHER PROTECTIVE EQUIPMENT: Eye-wash station. Safety shower. Rubber apron. Chemical safety shoes. Protective clothing. SECTION IX - SPECIAL PRECAUTIONS PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Store in cool, well-ventilated area away from all sources of ignition and out of direct sunlight. Ground all equipment to prevent accumulation of static charge. Keep containers tightly closed. Relieve pressure in drums weekly. Store away from incompatable materials. Do not store in unlabeled or mislabeled containers. OTHER PRECAUTIONS: Avoid contact with skin and eyes. Do not swallow. Use with adequate ventilation. Avoid prolonged or repeated breathing of vapors. Wash thoroughly after handling. Avoid dust or mist formation.

SECTION X - SUPPLEMENTAL HEALTH INFORMATION



#### MATERIAL SAFETY DATA SHEET

1-1-1 TRICHLOROETHANE CS-2008

SECTION X - SUPPLEMENTAL HEALTH INFORMATION

#### CARCINOGEN CONTENT

% PPM INGREDIENT

IARC NTP OSHA

NOTE: Hazard information is based upon the tested mixture and not individual ingredients. This product is not listed by IARC, NTP, or OSHA as a carcinogen.

LD50 ORAL : Rat: 10300 mg/kg
LD50 SKIN : Rabbit: 500 mg/24H (Moderate irritation)

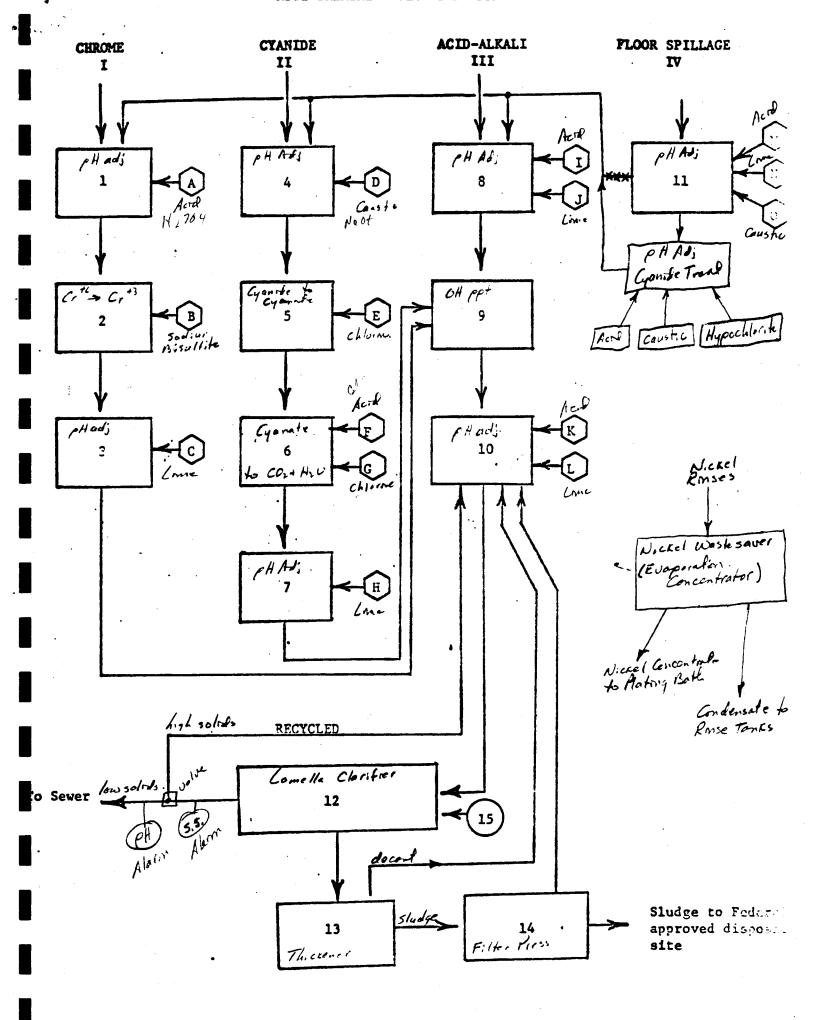
LC50 INHALATION: Rat LCLo: 1000 ppm

** ** ** ** ** ** ** ** ** **

The data in this Material Safety Data Sheet relates only to the specific material designated and does not relate to its use in combination with any other material or process. The data contained is believed to be correct. However, since conditions of use are outside our control it should not be taken as a warranty or representation for which Hydrite Chemical Co. assumes legal responsibility. This information is provided solely for your consideration, investigation, and verification.

### ATTACHMENT F

Wastewater Treatment Flow Diagram



#### ATTACHMENT G

Waste Analyses Results

#### P.D.C. LABORATORIES, INC.

(309) 676-4893

INDUSTRIAL WASTE ANALYTICAL SERVICES

1113 N. SWORDS AVENUE PEORIA, ILLINOIS 61604

	A	NALYTICAL REPORT FORM:		
To: Square D	Co IA	Date Collected	_ Date of Repor	t 5/5/86
3700 6th S	t. S.W.	Sampled By	_ Sample#_6P-05	5
Cedar Rapi	ds, IA 52405	Date Received 3/24/86	_ PDC#	
(319) 365-	4631	Date Completed 4/28/8	6_Permit#	
Attn: Jim Je	nsen		P.O.#	
Waste Stream_ Physical Appe	Metal hydrox arance: Odor_	ide sludge Color gre	en Paint Fil	ter <u>passed</u>
		Number of Phases		
Water Miscibi	lity <u>not water</u>	soluble Load Bearin	g Capacity	_tons/sq.ft
pH (neat); 8.49 (10% solution) Phase solid Solids 25.8 %  Flashpoint >200°F Acidity % Alkalinity %				
		Analysis Parameters		
Parameters	Total (mg/kg)	EP Toxicity (mg/1)	EPA Code	EP Limit (mg/1)
Arsenic	· · · · · · · · · · · · · · · · · · ·	<0.005	D004	5.0
Barium		6.52	D005	100.0
Cadmium		1.10	D006	1.0
Chromium tot		<0.25	D007	5.0
Lead		<0.50	D008	5.0
Mercury		<0.0005	D009	0.2
Selenium		<0.01	D010	1.0
Silver		0.05	D011	5.0
Cyanide	11.8			
Phenol	<5.0			
Sulfide	<0.5			
EOX	·			
BTU/1b.				
Cyanide	<0.9			
Reactive				
Sulfide	<0.5	<u></u>		
Reactive				

< = less than > = greater than

Note 1: All analysis are conducted utilizing recommended USEPA and IEPA

The paint filter and load bearing capacity tests are run according Note 2: to Illinois Pollution Control Board (6/84) Section 729.320/321

Laboratory Manager



## SERCO Laboratories St. Paul, Minnesota • Cedar Falls, Iowa

1922 Main Street — P. O. Box 625 Cedar Falls, Iowa 50613 Phone: (319) 277-2401.



#### EP Toxicity Test

Client:

Square D Company

Attn: Mr. Jim Jensen 3700 6th Street, SW

Cedar Rapids, IA 52406

Date Sampled: 7/31/86

Date Received: 8/12/86

Sample Identity: East Filter

#### Analysis

As	Received

Flashpoint (Closed Cup) Total Solids

> 200 ٥F 94.78

#### Concentration of Extract (mg/l)

Arsenic (as As) Barium (as Ba) Cadmium (as Cd) Total Chromium (as Cr) Lead (as Pb) Mercury (as Hg) Selenium (as Se) Silver (as Aq) Final pH (of Extract)

<0.01 <0.2 0.05 0.11 <0.2 <0.0005 <0.010 0.02 5.0 S.U.

<means less than</pre>

>means greater than

EP Toxicity Test performed according to 40 CFR Part 261.24. All analyses performed according to EPA publication SW-846, Second Edition.

Prepared and Submitted by

SERCO Laboratories

David W. Havick Senior Chemist

September 16, 1986 nh 1318A #6-09265

When Quality and Service Count



## SERCO Laboratories St. Paul, Minnesota • Cedar Falls, Iowa

1922 Main Street — P. O. Box 625 Cedar Falls, Iowa 50613 Phone: (319) 277-2401



#### EP Toxicity Test

Client:

Square D Company

Attn: Mr. Jim Jensen 3700 6th Street, SW

52406 Cedar Rapids, IA

Date Sampled:

7/14/86

Date Received: 8/12/86

Sample Identity: West Filter

#### Analysis

₹	T)		7
AS	Rec	eiv	ea.

Flashpoint (Closed Cup) Total Solids

>200 ٥F 95.69

#### Concentration of Extract (mg/l)

Arsenic (as As) Barium (as Ba)	<0.01
	0.3
Cadmium (as Cd)	0.03
Total Chromium (as Cr)	0.04
Lead (as Pb)	0.2
Mercury (as Hg)	<0.0005
Selenium (as Se)	<0.01
Silver (as Ag)	0.03
Final pH (of Extract)	5.1 S.U.

<means less than >means greater than

EP Toxicity Test performed according to 40 CFR Part 261.24. All analyses performed according to EPA publication SW-846, Second Edition.

Prepared and Submitted by

SERCO Laboratories

September 16, 1986 nh 1318A #6-09266

David W. Havick Senior Chemist

When Quality and Service Count

#### ATTACHMENT H

Restricted Waste Notification From Hydrite Chemical Company

### Restricted Waste Notification

# For Off-Site Treatment 40 CFR 264.73(b)(11) & 268.7(a)(1)

From Generator	
·	
То	•
The Waste listed on Manifest #_	
contains Restricted Wastes U.S.	EPA ID#
F001F002F003F004	F005
which include the following solv	vents
ethyl ether	tetrachloroethylene
methyl isobutyl ketone	trichloroethylene
n-butyl alcohol	methylene chloride
cyclohexanone	l,l,l-trichloroethane
methanol	carbon tetrachloride
cresols (cresylic acid)	chlorobenzene
toluene	1,1,2-trichloro-1,2,2-triflurothane
isobutanol	ortho-dichlorobenzene
carbon disulfide	trichlorofluoromethane
nitrobenzene	xylene
pyridine	acetone
methy! ethy! ketone	ethyl acetate
	ethyl benzene
This waste is suitable for treat 40CFR260 et al., which are:	tment technologies as listed in
Batch Distillation, Thin Film E	vaporation, Fractionation, Incineration,
Steam Stripping, Biological Trea	atment, Carbon Absorption, Air Stripping,
Wet Air Oxidation.	
I certify that, to the best of	my knowledge, the above information is
true, accurate, and complete.	
Name	
Signature	Date

#### ATTACHMENT E

Square D Company Photographs

#### ON SCENE PHOTOGRAPHS



Exp. Number: 1

Date: 10-29-87

Time: 1420 hours

Photographer: S. Freeman

Witness: C. Willhite

Camera: Olympus OM-1

Film: ASA 400

Attachments: 50 mm lens

Subject: Wastewater pretreatment unit at SDC.



Exp. Number: 2

Date: 10-29-87

Time: 1435 hours

Photographer: S. Freeman

Witness: C. Willhite

Camera: Olympus OM-1

Film: ASA 400

Attachments: 50 mm lens

Subject: 1,300 pound sack of F006 sludge at SDC.

#### ON SCENE PHOTOGRAPHS



Exp. Number: 3

Date: 10-29-87

Time: 1515 hours

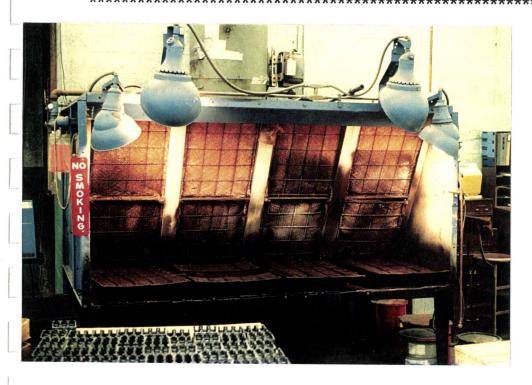
Photographer: S. Freeman

Witness: C. Willhite

Camera: Olympus OM-1

Film: ASA 400

Attachments: 50 mm lens



Exp. Number: 4

Date: 10-29-87

Time: 1530 hours

Photographer: S. Freeman

Witness: C. Willhite

Camera: Olympus OM-1

Film: ASA 400

Attachments: 50 mm lens

Subject: Overspray paint booth at SDC